

Letter Re: Status of Plaintiffs' Document Production

June 15, 2015

VIA ECF

MEMO ENDORSED

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JUN 16 2015

The Honorable Denise L. Cote
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1610
New York, NY 10007-1312

6/16/2015

Re: In re Credit Default Swaps Antitrust Litig., No. 13 MD 2476 (DLC)

Dear Judge Cote:

We represent the Plaintiff class in the above-captioned matter. We write with the consent of Defendants to update the Court regarding the status of Plaintiffs' document productions. Pursuant to the parties' Joint Initial Report, so ordered by Your Honor on September 18, 2014 (Docket Entry No. 334), the parties' deadline for substantial completion of document production is seven months from the service of document requests. Defendants served such requests on all Plaintiffs on October 22, 2014. As such, Plaintiffs' deadline for substantial completion was May 22, 2015.

Plaintiffs have represented to Defendants that they have been making diligent efforts to complete document production in a timely manner. Plaintiffs Salix Capital U.S. Inc. and Essex Regional Retirement System have represented that they have substantially completed their document production. Plaintiff Los Angeles County Employees Retirement Association has nearly finished such production and advised Defendants that its document production will be substantially complete by June 19, 2015. Counsel for Plaintiffs Value Recovery Fund and Delta Funds have represented that they will substantially complete document production on or before June 22, 2015.

In order that document and deposition discovery proceed expeditiously, the parties request that the Court set June 22, 2015 as Plaintiffs' deadline for substantial completion of document production.¹

The parties are available to discuss this matter with the Court should it have any questions.

Respectfully submitted,

/s/ George S. Trevor

George S. Trevor
Pearson, Simon & Warshaw, LLP

Granted.
Denise Cote
6/16/15

¹ In consenting to this proposed deadline Defendants reserve all rights with respect to any deficiencies in Plaintiffs' discovery responses.